



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



284769

REPLY TO THE ATTENTION OF

SR-6J

January 25, 2005

Mr. Clarence Smith
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Subject: PCBs Contamination at Phillips Pipe Line Company -
East St. Louis Terminal, Cahokia, Illinois

Dear Mr. Smith,

This letter is intended to inform you of some recent developments related to the Phillips Pipe Line Company - East St. Louis Terminal (Phillips) located in Cahokia, Illinois. As you are aware, Phillips entered Illinois' Site Remediation Program (SRP) in 1999 and is not included in the current definition of the Sauget Area 1 and Sauget Area 2 sites (Sauget Sites). However, data collection efforts seem to indicate that certain aspects of the Phillips facility may be integral to the cleanup efforts at the Sauget Sites.

In November 2003, the Southern District Court of Illinois (the Court) delivered a ruling finding the Rogers Cartage Company not liable to the United States for costs it has and will incur at the Sauget Area 1 Site in responding to hazardous substances released under CERCLA. Rogers Cartage allegedly hauled hazardous substances for Monsanto and washed PCB-containing trucks at its facilities, storing waste water generated from this process in large lagoons.

In April 2004, Pharmacia notified the Court of new sampling data collected at the Phillips property from the location of the old Rogers Cartage Cahokia facility on Cargill Road. The old Rogers Cartage Cargill Road facility was located in the southern portion of the Phillips property and bordered to the south by Cargill Road and a drainage channel/ditch that runs along Cargill Road into Dead Creek. As a result of this new data, DOJ requested the Court to re-open the record to accept this new evidence of Rogers' liability. The Government argued that hazardous substances discharged by Rogers Cartage at the Cahokia facility migrated from the lagoons into the ditch on Cargill Road and then flowed into Dead Creek.

The recent data collected at the old Rodgers Cartage facility shows extremely high concentrations of PCBs ranging from 2,400 ppb to 5,300,000 ppb in the lagoon area and 16,000 ppb to 61,000 ppb along the drainage channel/ditch on Cargill Road leading to Dead Creek. Figures 1 and 2 show the sampling locations and total PCB concentrations found in the southeast corner of the Phillips property. Figure 3 shows Phillips' proximity to Sauget Areas One and Two and Dead Creek.

Based on this data, U.S. EPA believes that an action is necessary to address the PCB contamination recently identified on the Phillips property. U.S. EPA also believes that action needs to be initiated soon and completed expeditiously to prevent any potential recontamination of Dead Creek. As the lead agency for the Sauget Sites, U.S. EPA intends to require the PCB contamination recently identified on the Phillips property be addressed under CERCLA absent quick voluntary action by Phillips.

In addition, I want to make you aware that the Sauget Area 2 PRP Group is in the process of evaluating whether Phillips is contributing to an Area 2 commingled groundwater plume. Depending on the results of this evaluation, we may need to further discuss how best to address this issue.

If you have any questions regarding this letter, please do not hesitate to contact me at (312) 353-6553.

Sincerely,

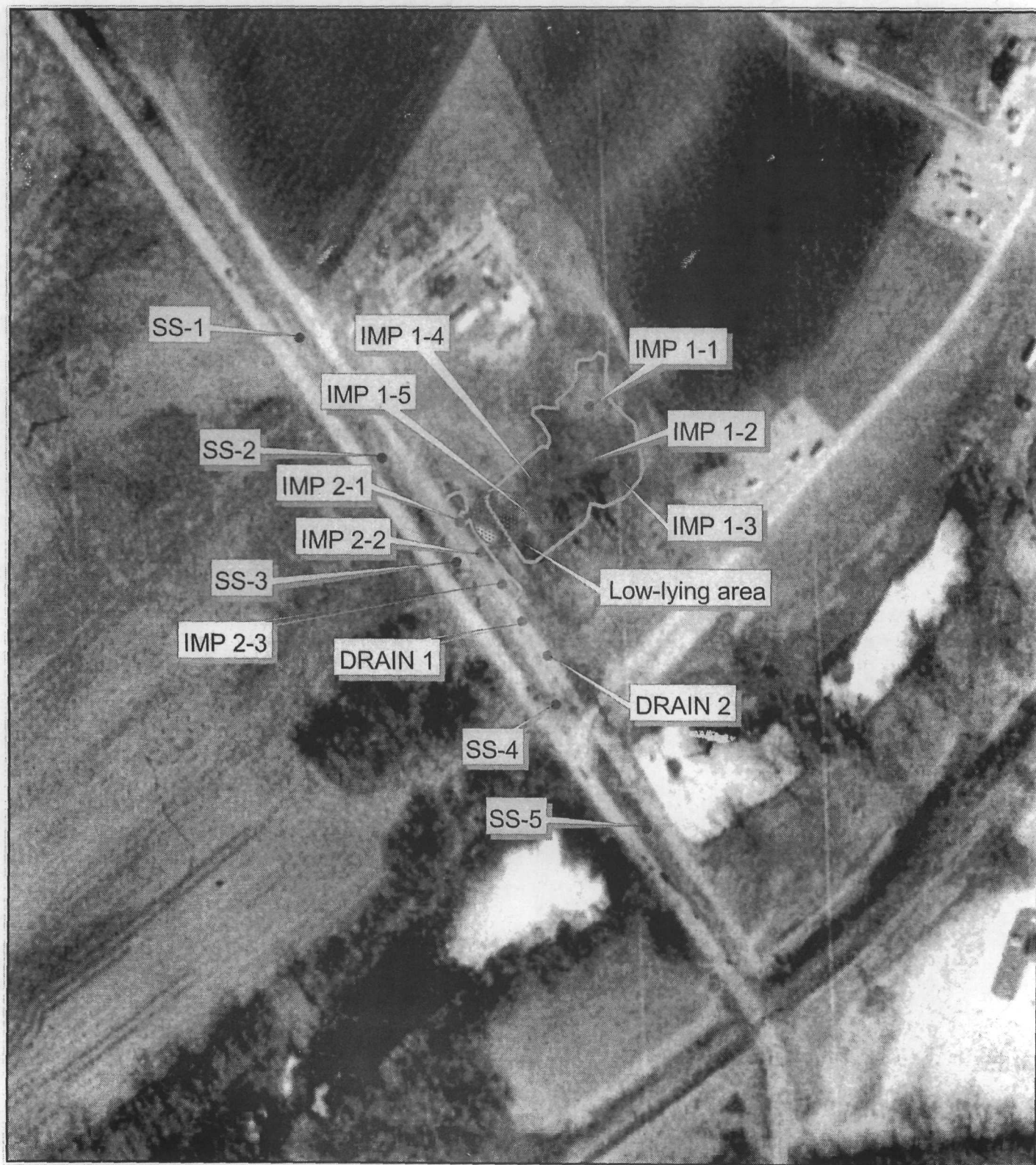


Wendy L. Carney, Chief
Remedial Response Branch #1
Superfund Division

Enclosures

cc: Terry Ayers, IEPA
Sandy Bron, IEPA
Tom Short, SFD
Nabil Fayoumi, SFD
Tom Martin, ORC

Figure 1. Rogers Cartage I Drainage Area Sampling Locations

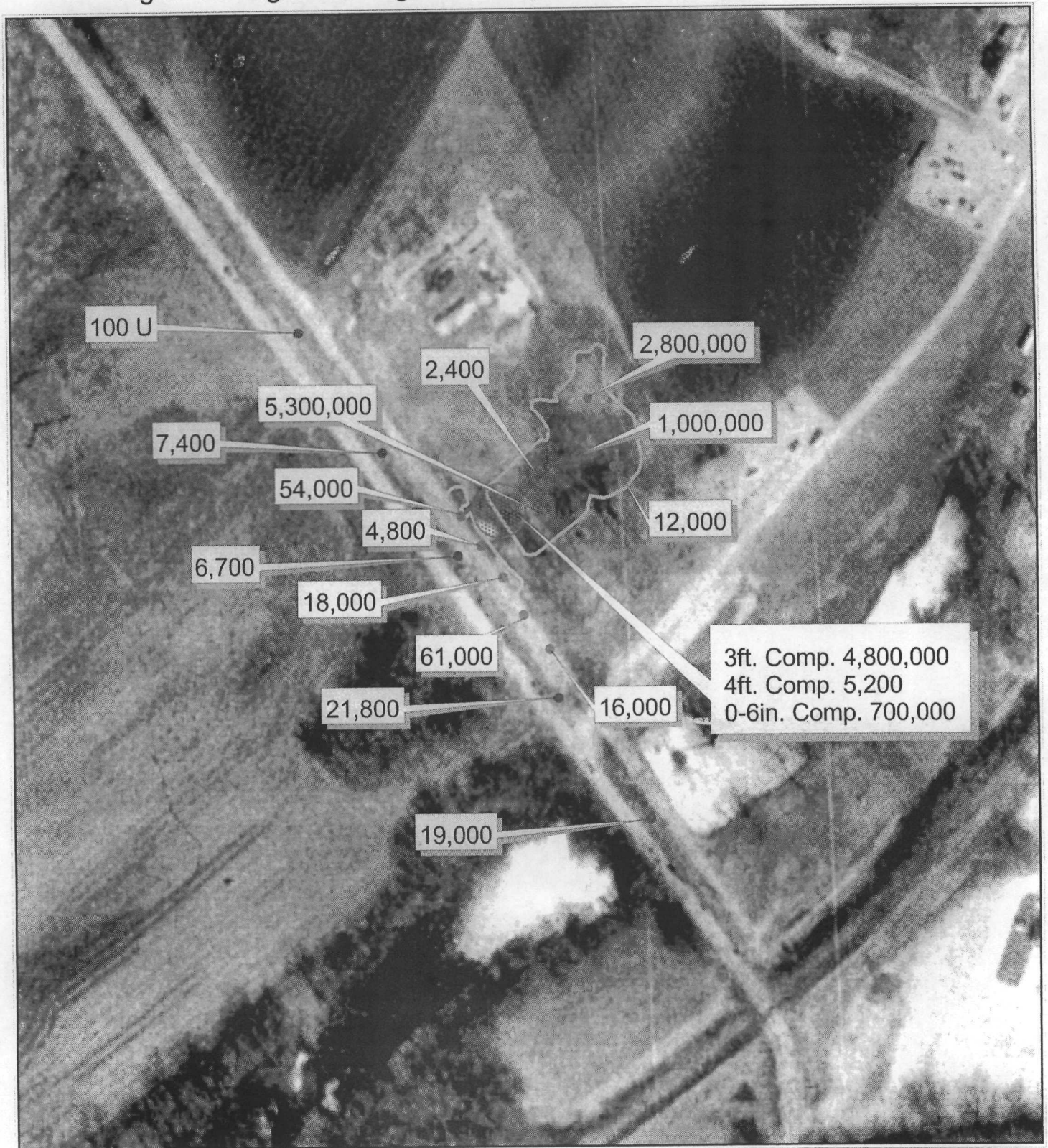


- 2002samples.shp
- ▨ 2004 lowlying.shp
- Samples 3/25/04
- ▭ 1967_impoundments.shp

100 0 100 200 Feet



Figure 2. Rogers Cartage I Drainage Area Total PCBs Data (ug/kg).



- 2002samples.shp
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